

SUPPORTING STATEMENT
U.S. Department of Commerce
U.S. Census Bureau
Census Employment Inquiry
Forms BC-170 and BC-170(SP), U.S. Census Employment Application (English and Spanish)
and
BC-171 and BC-171(SP), Additional Applicant Information (English and Spanish)
OMB Control No. 0607-0139

A. Justification

1. Necessity of Information Collection

The Census Bureau currently uses the BC-170A, BC-170B, and BC-170D forms to collect applicant information such as personal data and work experience. Administrative officials review the applicant information indicated on these forms to evaluate the eligibility and quality of an applicant for employment at the Census Bureau. In addition, the Census Bureau uses the Equal Employment Opportunity Commission (EEOC) common use form 3046-0046, *Demographic Information on Applicants for Federal Employment*, to collect voluntary applicant data. All of these forms are available online in a PDF fillable format for applicants to complete and submit to the Census Bureau Office. Paper forms of the BC-170A, B and D are available as a secondary option under some circumstances (i.e., special request, lack of internet access).

The Census Bureau currently uses the:

- BC-170A to collect applicant information for temporary office and field positions for current surveys such as the Current Population Survey (CPS).
- BC-170B to collect applicant information for temporary office and field positions for special censuses.
- BC-170D to collect applicant information for temporary office and field positions for Decennial censuses.
- EEOC common use form 3046-0046, *Demographic Information on Applicants for Federal Employment*, which asks about voluntary applicant information including *Race, Hispanic Origin, and Disability*.

Because the Census Bureau uses three different BC-170 forms based on the specific applicant information required for each operation, applicants interested in multiple positions across operations often need to submit duplicative information on different forms, which causes unnecessary burden on the applicants. Consequently, administrative officials often need to assess multiple forms that comprise duplicate information from the same applicant, which causes unnecessary burden on the administrative officials. Additionally, voluntary applicant information is currently captured across the three BC-170 forms and the EEOC common use form,

Demographic Information on Applicants for Federal Employment, adding to the undue burden on both the applicant and administrative official.

To address this issue, the Census Bureau intends to consolidate the contents of the four forms into two forms, the BC-170, *U.S. Census Employment Application* and the BC-171, *Additional Applicant Information* forms and the Spanish versions—BC-170(SP) and BC-171(SP). The current EEOC common use form 3046-0046, *Demographic Information on Applicants for Federal Employment* will be replaced by the BC-171. The BC-171 collects the same information as the EEOC common use form, including *Race, Hispanic Origin, and Disability*. In addition, the BC-171 contains the *Education and Recruiting Sources* questions needed to evaluate Census Bureau recruitment strategies. Upon receiving OMB approval, we plan to submit a “discontinue use” request for the EEOC common use form.

The Census Bureau conducted a thorough review of the three BC-170 forms and the EEOC common form to identify, assess, and eliminate redundant and/or nonessential collection of data that contributed to unnecessary burden on the applicant. Table A below includes additional information on how the four forms were consolidated into the BC-170 and BC-171.

Table A

Content	Old Forms				New Forms	
	BC-170A	BC-170B	BC-170D	EEOC Common Use Form	BC-170	BC-171
General Applicant Information	X	X	X		X	
Voluntary Applicant Information	X	X	X	X		X

The specific changes made to consolidate the BC-170A, B, and D are as follows:

1. Rearranged the contents so that the general applicant information questions, regardless of position and operations, appear in the BC-170 (e.g., *Name, Address*);
2. Removed the *Prior Work Experience* and *Education* fields as the Census Bureau no longer requires them to determine eligibility and/or qualifications of an applicant;
3. Removed the *Driver’s License* field as the Census Bureau does not use this to determine eligibility and/or qualifications of an applicant;
4. Removed the *Period of Service* and *Branch/Rank/Campaign Expeditionary Badge or Award* sub-fields in the *Veterans’ Preference* field as the Census Bureau already collects them elsewhere on the application through the DD-214 attachment;
5. Removed the *Types of Work* field as it is not needed to determine eligibility

and/or qualifications of an applicant;

6. Added a *Selective Service Number* sub-field in the *Selective Service* field in the BC-170 so that the Census Bureau could use this information to adjudicate the application since the OF-306 is not required from all applicants;
7. Added additional lines to the *Additional Information* section in the BC-170 to allow applicants to provide detailed information, as needed;
8. Updated the *Introduction* section in the BC-170 with updated descriptions of the *Types of Work, Duration of Work, Applicant Instructions, Eligibility, Pay, Training, Privacy Act Statement, and Assessment Instructions*;
9. Updated the *Availability* field to capture general applicant availability broken down into *Evenings, Weekends, and Weekdays* in lieu of specific applicant availability broken down into *Any Hours, Mornings, Afternoons, and Evenings* segmented by days of the week;
10. Moved the *Education* question to the BC-171 to make it voluntary, as it is used to determine recruitment strategies and is not needed to determine eligibility and/or qualifications of an applicant;
11. Moved the *Recruiting Sources* question to the BC-171 to make it voluntary, as it is used to determine recruitment strategies and is not needed to determine eligibility and/or qualifications of an applicant.

The Census Bureau intends for 2020 decennial census applicants to access, complete, and submit both the BC-170 and BC-171 to administrative officials via the Census Schedule A Recruitment, Assessment, and Payroll System (C-SHARPS) online applicant system. While application via the online applicant system is preferred, a paper version of the BC-170 and BC-171 will be accessible to 2020 decennial census applicants under some circumstances (i.e. special request, lack of internet access), and all forms will be available electronically in PDF format for applicants to complete and submit to the Census Bureau Office. Lastly, C-SHARPS, paper forms and the online PDF format forms will be available in Spanish for applicants in Puerto Rico. This is a change from the 60-day Federal Register Notice published on April 10, 2018, which states that both Stateside and Puerto Rico applicants will have access to the Spanish forms. Only Puerto Rico applicants will have access to the Spanish forms and the Spanish version of the online application system.

During 2020 decennial operations, the Census Bureau intends for current survey and special census applicants to submit a paper version of the BC-170 and BC-171 forms. Upon conclusion of 2020 decennial operations in September 2020, all applicants will be able to access, complete and submit both the BC-170 and BC-171 online.

The two proposed forms, the Spanish version of the forms and mock screens for the online system are attached in Attachment:

- 1 – BC-170
- 2 – BC-170(SP)
- 3 – BC-171
- 4 – BC-171(SP)
- 5 – C-SHARPS Mock Screens

This collection is authorized by Title 13, United States Code, Section 23 a and c.

2. Needs and Uses

BC-170:

The Census Bureau plans to use the BC-170 to collect applicant information such as personal data and availability. Administrative officials review the applicant information indicated on the BC-170 form to evaluate the eligibility and quality of an applicant for employment at the Census Bureau. Failure to collect this information could result in the hiring of unsuitable and/or unqualified workers.

BC-171:

While the BC-171 is a voluntary form which collects information not used to make selection decisions, it serves to allow the Census Bureau to comply with Federal directives, described in Section 11 of this document, *Justification for Sensitive Questions*, and to evaluate its recruiting sources.

The *Education and Recruiting Sources* information gathered on the BC-171 will assist the Census Bureau in determining if recruiting advertisements and tactics are working to produce qualified applicants and determine if persons at all education levels are attracted to the positions available.

3. Use of Information Technology

The Census Bureau intends to update the existing online job application system currently used for decennial operations using the BC-170D and the EEOC common request form, *Demographic Information on Applicants for Federal Employment*, by programming the changes proposed for the BC-170 and BC-171 into the existing system. The Census Bureau intends that these updates to the existing online job application system will allow applicants to access, complete and submit the BC-170 and BC-171 to administrative officials. The updated online application is expected to be ready for use by September 4, 2018 for applicants who wish to apply for positions in the decennial census.

After the conclusion of decennial operations in September 2020, the online version will be made available to both current surveys and special census applicants. Until that time, these operations will use the paper version of the BC-170 and BC-171.

4. Efforts to Identify Duplication

The BC-170 and BC-171 are intended to facilitate speedy hiring and selection in situations requiring large numbers of employees for assignments of a limited duration or on a longer basis for current surveys. Accordingly, the use of the proposed two forms will be limited to positions that will perform work for a variety of operations – decennial census, special censuses, one-time surveys, or recurring surveys. This will avoid undue paperwork.

5. Efforts to Minimize Burden

The proposed two forms request the minimum information necessary to hire workers for a variety of census positions.

6. Consequences of Less Frequent Collection

The completion of this form is a one-time collection.

7. Special Circumstances

There are no special circumstances.

8. Consultations Outside the Agency

The Census Bureau's Human Resources Division has consulted, on an ongoing basis since 1984, with the Office of Human Resource Management at the Department of Commerce. Currently, the Census Bureau's Human Resources Division has approval from the Department of Commerce to use this form for employment purposes.

The Census Bureau published a notice in the Federal Register on April 10, 2018 (83 FR 15356). The Census Bureau received the comments below, followed by our responses:

- On April 10, 2018 we received an email from Meghan Maury, Policy Director, National LGBTQ Task Force asking us to provide copies of the forms. We sent the requested forms to Ms. Maury via email and we did not receive any comments on the forms.
- On April 10, 2018 we received an email from Andrew Reamer, Research Professor from the George Washington Institute of Public Policy, George Washington University asking us to provide copies of the forms. We sent the requested forms to Mr. Reamer via email and we did not receive any comments on the forms.
- On April 15, 2018 we received an email from Jean Public expressing displeasure about the forms, which included derogatory government

expressions. The person asked for acknowledgement receipt of the email and we provided the acknowledgement on April 17, 2018.

- On May 17, 2018, we received an email from Teresa L. Guerrant, Attorney with the Office of Legal Counsel, Equal Employment Opportunity Commission asking us to provide copies of the forms. We sent the requested forms via email to Ms. Guerrant and we did not receive any comments on the forms.
- On June 10 and June 11, 2018, we received three comments in the Federal Docket Management System (FDMS.gov) unrelated to this submission. The comments were related the inclusion of the citizenship question for the 2020 Census. We provided these comments to the Decennial Census Management Division who manages the 2020 Census submission.

A copy of all comments, emails and our replies are included in Attachment 6.

9. Paying Respondents

The Census Bureau does not pay applicants or provide them gifts for applying for a Federal position.

10. Assurance of Confidentiality

The confidentiality of information contained on the BC-170 and BC-171 will be maintained according to the provisions of the Privacy Act, 5 U.S.C., 552a. The applicants are provided a copy of the Privacy Act Statement, which appears on the first few pages of each of the forms. Completion of the forms is required by applicants in order to receive consideration for employment.

11. Justification for Sensitive Questions

BC-170:

Administrative officials will review the information shown on the BC-170 form and determine the applicant's employment qualifications. Failure to collect this information could result in the hiring of unsuitable and/or unqualified employees.

BC-171:

In October 2003, the EEOC issued Management Directive (MD) 715-1, which directed and guided agencies to collect race and national origin data from applicants in order to evaluate possible barriers to equal employment opportunity. Subsequently, on March 3, 2010, a related joint memorandum was issued to Federal Directors of Equal Employment Opportunity and Chief Human Capital Officers from the Acting Chairman of the EEOC and the Director of the Office of Personnel Management. The joint memorandum reminded agencies of the importance of collecting applicant flow data and provided the *Demographic Information on*

Applicants for Federal Employment form for agencies to use to collect these data. In addition to being in compliance with MD 715-1, use of the BC-171 form is in compliance with Executive Order 13548, which is intended to increase Federal employment of individuals with disabilities. The Census Bureau's purposes for collecting race, Hispanic origin, and disability information are:

- To determine whether its recruitment and preliminary applicant activities are effectively reaching all segments of the relevant labor pool;
- To determine whether application and selection procedures and preliminary activities allow applicants to compete on a level playing field regardless of race, national origin, sex, or disability status.

12. Estimate of Hour Burden

Respondents will complete the BC-170 and BC-171 forms only once. We expect approximately 3 million responses through 2018, 2019, and 2020, of which 5% of the responses are expected via paper forms. Responses will be submitted by applicants throughout the census and intercensal periods for the special censuses, decennial pretests and various current surveys. Based on previous experience, the proposed two forms take an average of 20 minutes to complete: 15 minutes for the BC-170 and 5 minutes for the BC-171. The total hour burden over this three-year period is expected to be 1 million hours with an annual burden of approximately 333,334 hours.

13. Estimate of Cost Burden

The only cost to the respondent is his/her time for completing the BC-170 and BC-171.

14. Cost to Federal Government

Estimated cost for printing, keying and mailing the BC-170 and BC-171 is \$510,000. The cost is budgeted for and paid for by the Census Bureau.

15. Reason for Change in Burden

The Census Bureau is conducting various current surveys, several decennial census tests, and the 2020 decennial census over the next three years. As a result, we expect an increase in the number of candidates to apply, which raises the total burden hours to 1 million hours through 2018, 2019, and 2020.

16. Project Schedule

The BC-170 and BC-171 will be used throughout the census and intercensal periods for the special censuses, decennial pretests and various current surveys.

17. Request not to Display Expiration Date

Since the BC-170 and BC-171 will be used frequently and will not change often, the Census Bureau requests permission to not display the expiration date on the form to avoid needless reprinting, only on the paper and PDF online forms. This request does not extend to the online application system C-SHARPS. C-SHARPS will display the expiration date.

18. Exceptions to the Certification

There are no exceptions.

Attachments:

1. Form BC-170
2. Form BC-170(SP)
3. Form BC-171
4. Form BC-171(SP)
5. C-SHARPS Online Applicant System Mock Screens
6. Email comments and Census Bureau replies during the 60-day comment period